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From: Commander, Western Division, Naval Facilities Engineering Command
To: Distribution

Subj: REMEDIAL INVESTIGATION/FEASIBILITY STUDY AT NAVAL AIR STATION, ALAMEDA

Encl: (1) Final Health and Safety Plan
(2) Final Air Sampling Plan
(3) Department of Health Services comments and Navy responses on NAS Alameda Health and Safety Plan
(4) Bay Area Air Quality Management District comments and Navy responses on NAS Alameda Air Sampling Plan

1. Enclosures (1) and (2) are our final Health and Safety Plan (HSP) and Air Sampling Plan (ASP) respectively for the Remedial Investigation/Feasibility Study at the Naval Air Station (NAS), Alameda. Enclosure (3) is a summary of the Department of Health Services (DOHS) comments on the Draft Health and Safety Plan and the Navy responses to the comments. Enclosure (4) is a summary of the Bay Area Air Quality Management District (BAAQMD) and the Navy responses to the comments. The final HSP and ASP have incorporated the comments provided by the DOHS and BAAQMD respectively.

2. We believe that the final HSP and ASP are consistent with the comments provided by DOHS and BAAQMD as well as applicable federal, state and local guidance. Also, the final HSP and ASP are intended to satisfy the substantive state requirements referenced in Section 5.1.2.5 and Section 5.1.2.2 (Air Sampling portion) respectively of the Remedial Action Order (Docket No. HSA32/80-051).

3. If you feel that the final HSP and ASP do not adequately reflect regulatory agencies review comments or are not consistent with applicable guidelines, rules and regulations, please advise us within fifteen days of the date of this letter.

4. Thank you for your interest, guidance and involvement in this matter. Please direct any questions or comments to Commander, Western Division, Naval Facilities Engineering Command (Attn: Ms. Bella G. Dixon, Code 181380, Autovon 650-7512 or Commercial (415) 377-7512).

Original signed by:

Bella G. Dixon

Acting Head, Installation Restoration
Section

By direction

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Distribution:

Environmental Protection Agency, Region IX (Attn: Nick Morgan)
California Department of Health Services (Attn: Don Cox)
California Regional Water Quality Control Board (Attn: Lester Feldman)
Bay Area Air Quality Management District (Attn: Scott Lutz)
U.S. Fish & Wildlife Services (Attn: Don Palavski)
California Department of Fish & Game (Attn: Mike Rugg)
National Oceanic & Atmospheric Administration (Attn: Chip Domarest)
U.S. Army Corps of Engineers (Attn: Sharon Horlund)
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NAS Alameda (Attn: Randy Cate)

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WRITER: B. Dizon/1813BD/7496
TYPIST: B. Palmer/21 Dec 88/Ser 3103S
FILE: ALAMEDA/NAS

ENCLOSURE 1

FINAL
HEALTH AND SAFETY PLAN

DATED 01 DECEMBER 1988

IS ENTERED IN THE DATABASE AND FILED AT
ADMINISTRATIVE RECORD NO. **N00236.000274**

ENCLOSURE 2

FINAL AIR SAMPLING PLAN

DATED 01 DECEMBER 1988

IS ENTERED IN THE DATABASE AND FILED AT
ADMINISTRATIVE RECORD NO. **N00236.000275**

NAVY'S RESPONSES TO DEPARTMENT OF HEALTH SERVICES
COMMENTS ON THE HEALTH AND SAFETY PLAN
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
NAVAL AIR STATION, ALAMEDA
ALAMEDA, CALIFORNIA

The comments from the Department of Health Services were originally contained in a memorandum from Donald L. Cox to Captain R. Boennighousen, USN, dated November 16, 1988. A copy of this memorandum has been attached. The Navy's responses which are listed below are labeled with the same section numbers which were used to designate the comments in the attached memorandum from Donald Cox.

1. The text in Section 11.0 Training on the NAS Alameda Health and Safety Plan, has been revised to include the additional eight hours of training for supervisory personnel and the three days of field experience for personnel on-site.
- 2a. The noise hazard was addressed in Subsection 3.2 on page 14. The text has been revised to clarify our position on hearing protection. Hearing protection has been included as optional equipment in Section 6.0 on Personnel Protection.
- 2b/c. Latex gloves will be used as undergloves for polyvinyl chloride or other chemical -resistant gloves for personnel handling soil and water samples, and for barrel handling.
- 2d. In regard to our compliance with 29 Code of Federal Regulations (CFR) 1910.120 (g)(5), maintenance and storage of personal protective equipment shall be in compliance with 29 CFR 1910.134. The personal protective equipment program is part of the contractor's Health and Safety Training Manual.
- 2e/f. The respiratory protective program and respirator fit-test procedure is part of the Contractor's Health and Safety Training Manual; it will be included as Appendix D.
- 3a. Section 12.0 Medical Surveillance, has been amended to reference 29 CFR 1910.120. A medical surveillance program is included in the Contractor's Health and Safety Training Manual.
- 4a. Section 3.2 has been revised to clarify our position on noise monitoring, as suggested.
- 4b. Section 5.0 has been revised to show that monitoring equipment will be calibrated before each use and that the calibration will be checked after each use.

Enclosure (3)

- 4c. Calibration procedures are addressed in Section 7 of the Quality Assurance Project Plan, Volume 3 of the RI/FS Work Plan.
- 4d. The person monitoring the equipment is designated to do any field calibration, and the field logs will contain his/her name.
- 4e. Section 3.2 on physical hazard has been revised to address concerns about radiation monitoring. The telephone number of DOHS's Radiological Health, Environmental Health Unit has been included. Section 6.0 Personnel Protection has also been revised concerning the controls over potential radiation exposure. Radiation monitoring will use equipment recommended by DOHS when conducting monitoring for human hazards. The meter referred to as a "Dust Meter" is the mini-RAM. The plan now refers to the mini-RAM instead of the "Dust Meter."
- 5. Site communication is addressed in Section 7.0 Work Zones and Security Measures. More specific recommendations can not be made at this time, because the suitability of the different types of communication are site dependent. Radio communications will require special coordination because the project is within a military reservation.
- 6. Decontamination procedures are included in the Contractor's Health and Safety Training Manual. A more complete description of the decontamination procedures can be found in Section 8.0.
- 7. These items are included in the Contractor's Health and Safety Training Manual. Appendix D contains the respirator fit-test protocol and the respiratory protective program.
- 8. Maps to the Industrial Medical Clinic and the Alameda Hospital are included with the figures (see Figures C-1 and C-2).

NAVY'S RESPONSES TO BAAQMD COMMENTS ON THE
SAMPLING PLAN AND AIR SAMPLING PLAN
REMEDIAL INVESTIGATION/FEASIBILITY STUDY
NAVAL AIR STATION, ALAMEDA
ALAMEDA, CALIFORNIA

The following paragraphs provide the comments by the Bay Area Air Quality Management District (BAAQMD) on the Sampling Plan (Volume 1) and the Air Sampling Plan (Volume 1B) of the RI/FS Work Plan, Naval Air Station, Alameda and the Navy's responses to them.

BAAQMD Comments on Volume 1B:

"The Air Sampling Plan using EPA and NIOSH methodologies is acceptable. However, the District uses Tedlar bags to sample ambient air for toxic volatile organic compounds and generally recommends Tedlar bags and/or passivated (Summa polished) stainless steel canisters for sampling of air contaminated with highly volatile compounds such as vinyl chloride. Generally very low detection limits (1 ppb) are achievable using these methods. If inadequate data is generated by the initial sampling program, the District recommends that these methods be considered for a more rigorous sampling program. The Air Sampling Plan, did not include Tables 3.1, 3.2, and 3.3."

Responses:

The Air Sampling Plan (Volume 1B) will be revised to indicate that the U.S. Environmental Protection Agency (EPA) and National Institute for Occupational Safety and Health (NIOSH) methodologies which were previously described in the Final Draft will constitute the Primary Sampling Program at the site. Volume 1B will also be revised to state that if in the judgment of the site Health and Safety Officer (HSO) the data generated by this primary sampling program are inadequate at any of the locations, the HSO may recommend additional sampling using alternative sampling media at those locations. The sampling media and methods will be selected to suit the specific requirement for additional information at each location. The BAAQMD recommendation of Tedlar bags and/or passivated stainless steel canisters to achieve low detection limits on samples of air contaminated with highly volatile compounds will be noted in Volume 1B, and these methods will be carefully considered for additional sampling as required.

We regret the oversight of failing to include Tables 3.1, 3.2, and 3.3 in the copy of Volume 1B which was sent to the BAAQMD for review, and we are attaching copies of those tables to this letter.

Enclosure (4)

BAAQMD Comments on Volume 1:

"The Sampling Plan, Volume 1 (Section 3.3), describes Area 97. This area is contaminated with aviation gasoline. However, the Navy has already installed three ventilation fans in utility trenches at Area 97. One of these fans is currently operating and emitting approximately 24 lb/day of VOC (hexane and toluene detected). The District issued a violation notice to NAS in October 1987 for the installation and operation of these sources. NAS then submitted a permit application for our review. The District wishes to be notified in advance of the installation of any source that is capable of emitting air contaminants. The District is concerned that no mention was made of this installation in the site description found in Section 3.3 of the Sampling Plan."

Response:

The Sampling Plan (Volume 1) will be revised to provide a description of these features and to refer to past problems at Area 97.